Case3:11-cr-00466-WHA Document1 Filed07/08/11 Page1 of 6 Submit by Email AO 257 (Rev: 6/78) DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT Name of District Court, and/or Judge/Magistrate Location BY: COMPLAINT X INFORMATION INDICTMENT NORTHERN DISTRICT OF CAST ORNIA SUPERSEDING SAN FRANCISCO DI OFFENSE CHARGED **DEFENDANT - U.S.** 26 U.S.C. § 7201 - Tax Evasion (6 Petty Counts) ANN RAY, aka GEORGIA ENGELHARRICHARD Minor Misde-E-filing NORTHERN DISTRICT meanor DISTRICT COURT NUMBER Felony PENALTY: 26 U.S.C. § 7201 - 5 yrs prison, \$250,000 fine, 3 yrs supervised release, \$100 assessment DEFENDANT IS NOT IN CUSTODY **PROCEEDING** Has not been arrested, pending outcome this proceeding. Name of Complaintant Agency, or Person (&Title, if any) If not detained give date any prior summons was served on above charges INTERNAL REVENUE SERVICE 2) Is a Fugitive person is awaiting trial in another Federal or State Court, give name of court Is on Bail or Release from (show District) this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show IS IN CUSTODY District On this charge this is a reprosecution of On another conviction charges previously dismissed Awaiting trial on other which were dismissed on SHOW charnes motion of: DOCKET NO. If answer to (6) is "Yes", show name of institution U.S. Att'y Defense this prosecution relates to a pending case involving this same Yes If "Yes" Has detainer defendant MAGISTRATE give date been filed? No prior proceedings or appearance(s) CASE NO. filed before U.S. Magistrate regarding Month/Day/Year this defendant were recorded under DATE OF ARREST Name and Office of Person Or... if Arresting Agency & Warrant were not Furnishing Information on MELINDA HAAG Month/Day/Year THIS FORM DATE TRANSFERRED Other U.S. Agency U.S. Att'y TO U.S. CUSTODY Name of Asst. U.S. Att'y THOMAS MOORE, AUSA, TAX DIV. This report amends AO 257 previously submitted (if assigned) ADDITIONAL INFORMATION OR COMMENTS — PROCESS: SUMMONS X NO PROCESS* WARRANT **Bail Amount:** If Summons, complete following: Arraignment Initial Appearance *Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Defendant Address:

Comments:

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MELINDA HAAG (CABN 132612) United States Attorney





UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

v.

ANN RAY, aka GEORGIA ENGELHART,

Defendant.

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<u>VIOLATIONS</u>: 26 U.S.C. § 7201 - Tax Evasion (6 Counts)

SAN FRANCISCO VENUE

INFORMATION

The United States Attorney charges:

COUNT ONE: (26 U.S.C. § 7201 - Tax Evasion)

On or about April 15, 2005, in the Northern District of California, the defendant, ANN RAY, aka GEORGIA ENGELHART,

a resident of Woodside, California, who during the calendar year 2004 was married, did willfully and knowingly attempt to evade and defeat a part of the income tax due and owing by her and her spouse to the United States of America for the calendar year 2004 by preparing, signing, and delivering, and causing to be prepared, signed, and delivered, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, which tax return was filed with the Internal Revenue Service,

wherein it was stated that the tax due and owing to the United States for the calendar year 2004 was \$19,038.00, whereas, as she then and there well knew and believed, their joint tax liability for the said calendar year was substantially in excess of that stated on said tax return and that an additional tax of \$254,737.00 was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

COUNT TWO: (26 U.S.C. § 7201 - Tax Evasion)

On or about April 17, 2006, in the Northern District of California, the defendant, ANN RAY, aka GEORGIA ENGELHART,

a resident of Woodside, California, who during the calendar year 2005 was married, did willfully and knowingly attempt to evade and defeat a part of the income tax due and

a resident of Woodside, California, who during the calendar year 2005 was married, did willfully and knowingly attempt to evade and defeat a part of the income tax due and owing by her and her spouse to the United States of America for the calendar year 2005 by preparing, signing, and delivering, and causing to be prepared, signed, and delivered, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, which tax return was filed with the Internal Revenue Service, wherein it was stated that the tax due and owing to the United States for the calendar year 2005 was \$20,118.00, whereas, as she then and there well knew and believed, their joint tax liability for the said calendar year was substantially in excess of that stated on said tax return and that an additional tax of \$224,147.00 was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

COUNT THREE: (26 U.S.C. § 7201 - Tax Evasion)

On or about April 16, 2007, in the Northern District of California, the defendant, ANN RAY, aka GEORGIA ENGELHART,

a resident of Woodside, California, who during the calendar year 2006 was married, did willfully and knowingly attempt to evade and defeat a part of the income tax due and owing by her and her spouse to the United States of America for the calendar year 2006 by preparing, signing, and delivering, and causing to be prepared, signed, and delivered, a

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false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, which tax return was filed with the Internal Revenue Service, wherein it was stated that the tax due and owing to the United States for the calendar year 2006 was \$13,105.00, whereas, as she then and there well knew and believed, their joint tax liability for the said calendar year was substantially in excess of that stated on said tax return and that an additional tax of \$263,183.00 was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

COUNT FOUR: (26 U.S.C. § 7201 - Tax Evasion)

On or about April 15, 2008, in the Northern District of California, the defendant, ANN RAY, aka GEORGIA ENGELHART,

a resident of Woodside, California, who during the calendar year 2007 was married, did willfully and knowingly attempt to evade and defeat a part of the income tax due and owing by her and her spouse to the United States of America for the calendar year 2007 by preparing, signing, and delivering, and causing to be prepared, signed, and delivered, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, which tax return was filed with the Internal Revenue Service, wherein it was stated that the tax due and owing to the United States for the calendar year 2007 was \$15,353.00, whereas, as she then and there well knew and believed, their joint tax liability for the said calendar year was substantially in excess of that stated on said tax return and that an additional tax of \$190,152.00 was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

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COUNT FIVE: (26 U.S.C. § 7201 - Tax Evasion)

On or about April 15, 2009, in the Northern District of California, the defendant, ANN RAY, aka GEORGIA ENGELHART,

a resident of Woodside, California, who during the calendar year 2008 was married, did willfully and knowingly attempt to evade and defeat a part of the income tax due and owing by her and her spouse to the United States of America for the calendar year 2008 by preparing, signing, and delivering, and causing to be prepared, signed, and delivered, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, which tax return was filed with the Internal Revenue Service, wherein it was stated that the tax due and owing to the United States for the calendar year 2008 was \$11,924.00, whereas, as she then and there well knew and believed, their joint tax liability for the said calendar year was substantially in excess of that stated on said tax return and that an additional tax of \$242,818.00 was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

COUNT SIX: (26 U.S.C. § 7201 - Tax Evasion)

On or about April 15, 2010, in the Northern District of California, the defendant, ANN RAY, aka GEORGIA ENGELHART,

a resident of Woodside, California, who during the calendar year 2009 was married, did willfully and knowingly attempt to evade and defeat a part of the income tax due and owing by her and her spouse to the United States of America for the calendar year 2009 by preparing, signing, and delivering, and causing to be prepared, signed, and delivered, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, which tax return was filed with the Internal Revenue Service, wherein it was stated that the tax due and owing to the United States for the calendar year 2009 was \$4,831.00, whereas, as she then and there well knew and believed, their joint tax liability for the said calendar year was substantially in excess of that stated on said tax return and that an additional tax of \$94,890.00 was due and owing to the United States of

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America. All in violation of Title 26, United States Code, Section 7201. **MELINDA HAAG** United States Attorney Jou (a) MIRANDA/KANE Assistant United States Attorney Chief, Criminal Section Approved as to Form THOMAS MOORE Assistant United States Attorney Chief, Tax Division

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